

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Michelle Simha, as Trustee
for the Next-of-Kin of Noah Leopold,

Plaintiff,

vs.

Mayo Clinic,

Defendant.

Civil File No.
24-CV-01097-DTS

Declaration of Brandon Thompson
Plaintiff's Memorandum of Law in Response to
Mayo's Motion for Discovery Sanctions

Brandon Thompson declares and states as follows:

1. I am one of the attorneys representing the Trustee in the above-entitled matter. This declaration is submitted in support of Plaintiff's Memorandum of Law in Response to Mayo's Motion for Discovery Sanctions.

2. Attached hereto as Exhibit CC is a true and correct copy of e-mails and correspondence between counsel for Plaintiff and Defendant.

3. Attached hereto as Exhibit DD is a true and correct copy of Defendant Mayo Clinic's Objections and Responses to Plaintiff's First Set of Requests for Production.

4. Attached hereto as Exhibit EE is a true and correct copy of Defendant Mayo Clinic's Responses to Plaintiff's Interrogatories – Set 1.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Dated: October 8, 2024

/s/ Brandon Thompson
Brandon Thompson